

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 25-CV-22652-KMW

ALEJANDRO MOSQUEDA PAZ
p/k/a “ALMIGHTY,”

Plaintiff,

v.

PRIMO BOYZ RECORDS LLC a/k/a
PRIMO BOYZ RE L.L.C, PRIMO BOYZ
MUSIC PUBLISHING L.L.C., and JOSÉ
POLANCO,

Defendants.

_____/

JOINT RESPONSE TO ORDER TO SHOW CAUSE

Plaintiff, Alejandro Mosqueda Paz a/k/a “Almighty” (hereinafter referred to as “Plaintiff”), and Defendants, Primo Boyz Records LLC a/k/a Primo Boyz RE L.L.C, Primo Boyz Music Publishing L.L.C., and José Polanco (hereinafter referred to as “Defendants”)(collectively “Parties”) hereby file this joint response to the Court Order to Show Cause dated October 20, 2025 (ECF No. 28) and as grounds state:

1. On September 16, 2025, the Court issued a Scheduling Order directing the Parties to select a certified mediator, schedule mediation, and jointly file a notice of the selected mediator and mediation date within thirty (30) days.

2. The Parties acknowledge that they did not file the required notice by the deadline. This failure was the result of an inadvertent oversight, compounded by a calendaring error that resulted in the mediation deadline not being properly entered in either Party's case calendar.

3. The Parties deeply regret this oversight and have taken remedial steps to prevent similar issues in the future, including reviewing internal calendaring procedures and ensuring that all future Court deadlines are confirmed and recorded.

4. The Parties wish to emphasize that they strive to follow the Court's orders and directions. In fact, pursuant to federal law and local rules, the Parties recently engaged in meaningful dialogue concerning Plaintiff's Motion to Strike. The Parties met and conferred at least twice by telephone, which resulted in several issues being resolved without the need for Court intervention. This demonstrates two salient points: (1) that the Parties are committed to complying with orders and procedures; and (2) that the failure to address mediator selection was not a product of disregard but a genuine oversight; had it been on either Party's radar, it would likely have been discussed and addressed during these recent cooperative efforts.

5. As of the date of this filing, the Parties have selected a certified mediator and scheduled a mutually agreeable date, time, and location for mediation. *See* ECF No. 29.

WHEREFORE The Parties respectfully request that the Court find good cause shown, decline to impose sanctions, and accept this filing as compliance with the Court's Order.

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

The undersigned counsel hereby certifies that, in compliance with Rule 7.1(a)(3), Federal Rules of Civil Procedure, that undersigned counsel has conferred with counsel for Defendants regarding the contents of this response and this response is therefore being filed jointly.

Dated: October 21, 2025

Respectfully submitted,

By: /s/ Humberto Rubio

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21 day of October, 2025, I caused to be served a true and correct copy of the foregoing using CM/ECF, which served a true and correct copy to all counsel or parties of record.

By: /s/ Humberto Rubio
Humberto Rubio, Jr., Esq.